

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	NO. 1:CR-16-	
	)		
v.	)	(JUDGE	)
	)		
WILEY HUMPHREY	)		

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1  
(Conspiracy, 18 U.S.C. § 371)

In or around August of 2013 and continuing thereafter until at least September of 2013, in Schuylkill County, Pennsylvania, and at other locations within the Middle District of Pennsylvania and elsewhere, the defendant,

**WILEY HUMPHREY,**

knowingly, willfully, and unlawfully conspired and agreed with other persons, known and unknown to the United States, to violate: Title 18, United States Code, Section 1341, use of the mails and interstate carriers, for the purpose of executing a scheme devised to defraud an Insurance Carrier.

***MANNER AND MEANS***

- a. It was a part of and purpose of the conspiracy that Humphrey would purposefully damage a Chevy Volt vehicle which was owned by an entity registered in Pennsylvania as a Limited Liability Company ("the LLC").
- b. It was further part of the scheme that a representative from the LLC ("Co-Conspirator A") would then submit or cause to be submitted a fraudulent claim to the LLC's Insurance Carrier, ("the Insurance Carrier") indicating that the Chevy Volt vehicle was damaged and requesting payment on an insurance claim for the vehicle.
- c. It was further a part and purpose of the scheme that the money paid by the Insurance Carrier for the insurance claim would be used to satisfy or contribute to satisfying a lien held on the vehicle.
- d. It was further a part and purpose of the scheme that Co-Conspirator A would pay Humphrey \$1,000 for damaging the vehicle.

### ***OVERT ACTS***

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others were committed by the defendant and others in the Middle District of Pennsylvania and elsewhere:

1. In or around August of 2013, Co-Conspirator A stated that he would pay Humphrey \$1,000 if Humphrey would purposefully damage a Chevy Volt vehicle owned and insured by the LLC.
2. On or about August 26, 2013, Humphrey drove the said vehicle on Lincoln Road in Pine Grove, Pennsylvania, which is located in the Middle District of Pennsylvania.
3. While on Lincoln Road, Humphrey purposefully and repeatedly drove the vehicle into large boulders and rocks damaging the vehicle.
4. On August 26, 2013, following the crash, Co-Conspirator A paid Humphrey \$500, instead of the previous agreed-upon amount of \$1,000.
5. On or about August 27, 2013, Co-Conspirator A filed or caused to be filed a claim with the Insurance Carrier for the damage to the vehicle.

6. On or about August 28, 2013, Humphrey informed an agent for the Insurance Carrier that, while driving the vehicle on Lincoln Road between 8:00 and 9:00 PM on August 27, 2013, a group of deer ran in front of the vehicle and when he swerved to miss the deer, he hit a huge rock causing the vehicle to roll onto its side, smashing a window.

7. As a result of this scheme, on or about September 6, 2013, the defendant caused the Insurance Carrier to mail a check, in the amount of \$28,442.03, to satisfy or contribute to satisfying the lien possessed on the vehicle.

All in violation of Title 18, United States Code, Section 371.

PETER J. SMITH  
UNITED STATES ATTORNEY



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SCOTT R. FORD  
ASSISTANT U.S. ATTORNEY

DATE: 6/23/16